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SUPERIOR COURT
YAVAPAI COUNTY, ARIZONA

2011 JUL -1 PM 1:59

SANDRA A. MARKHAM, CLERK

BY: Ivy Rios

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF YAVAPAI**

STATE OF ARIZONA,

Plaintiff,

vs.

STEVEN DEMOCKER,

Defendant.

) P1300CR201001325

)

)

) *First*

) NOTICE OF DEFENSES /

) RULE 15.2 DISCLOSURE

)

)

) (Hon. Warren Darrow)

)

)

The Defendant, by and through undersigned counsel, pursuant to Rule 15.2(b), of the Arizona Rules of Criminal Procedure, hereby gives notice that, *in addition to NOT GUILTY*, the following *checked defenses* may be raised at trial:

- | | |
|---------------------------------------|---|
| <u> </u> 1. Alibi | <u> </u> 15. Invalidity of prior conviction |
| <u> </u> 2. Guilty except Insane | <u> </u> 16. Good character |
| <u> </u> 3. Suicide | <u> </u> 17. Lack of specific intent |
| <u> </u> 4. Entrapment | <u> </u> 18. No criminal intent |
| <u> </u> 5. Consent | <u> </u> 19. Mistaken identity |
| <u> </u> 6. Impotency | <u> </u> 20. Insufficiency of prior conviction |
| <u> </u> 7. Marriage | <u> X </u> 21. Insufficiency of State's Evidence |
| <u> </u> 8. Mere Presence | <u> </u> 22. Justification: Crime Prevention |
| <u> </u> 9. Immaturity | <u> </u> 23. Necessity |
| <u> </u> 10. Act of God | <u> </u> 24. Self-Defense |
| <u> </u> 11. Diminished Capacity | <u> </u> 25. Duress |
| <u> </u> 12. Coercion | <u> </u> 26. Defense of Others |
| <u> </u> 13. Accident | <u> </u> 27. Defense of Property |
| <u> </u> 14. Illegal Search | <u> X </u> 28. Third Party Culpability |

Per Rule 15.2(b) and (c), of the Arizona Rules of Criminal Procedure, the Defendant

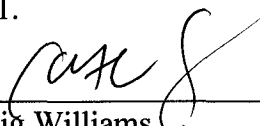
hereby provides the following **disclosure**. The Defendant may call the following witnesses:

- 1) Any and all individuals named or referred to in the Grand Jury Transcripts, police reports, or in **any portion** of the State's Rule 15 disclosure; any and all persons named or referred to in any YCSO Offense Reports or related documents which concern the Defendant and are known to the prosecutor; persons previously disclosed, coroners reports, DNA reports, exhibits, photographs, etc.
- 2) Any and all individuals, including but not limited, to any Victim Assistance caseworkers and/or volunteers who have spoken with any of the witnesses in this case;
- 3) All investigator(s), assigned to case.
- 4) Melissa Beddow, Chromosomal Laboratories, Forensic Report dated June 13, 2011, attached.
- 5) Greg Curry, financial expert. Updated report to be disclosed as soon as it is available.
- 6) Randy Anglin, forensic expert. Updated report to be disclosed as soon as it is available.
- 7) Dr. Terry Haddix, forensic pathologist.
- 8) Dr. Nora Rudin, DNA expert.

Defendant reserves the right to supplement this list if and when more witnesses become known. The investigations by both parties are ongoing. In addition, the Defendant may introduce at trial the following tangible objects:

- 1) Photographs, video tape, and diagrams of the alleged crime scene
- 2) Any evidence, including an object or document disclosed or referred to by the State;
- 3) Any object or document disclosed, used or *referred to* by the State;
- 4) Any written or electronically recorded statements by any of the witnesses;
- 5) Documentation previously disclosed by either party;

RESPECTFULLY SUBMITTED on July 1, 2011.



Craig Williams
Attorney for Defendant

Copies of the foregoing delivered this date to:
Hon. Warren Darrow, Judge of the Superior Court
Jeff Paupore, Yavapai County Attorney's Office
Steve Young, Yavapai County Attorney's Office

By  _____